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PUC CONSOLIDATED DOCKET NO. 48785

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JOINT APPLICATION OF ONCOR § BEFORE THE STATE OFFICE
ELECTRIC DELIVERY COMPANY §
LLC, AEP TEXAS INC., AND LCRA §
TRANSMISSION SERVICES §
CORPORATION TO AMEND THEIR §
CERTIFICATE OF CONVENIENCE § OF
AND NECESSITY FOR 345-KV §
TRANSMISSION LINES IN PECOS, §
REEVES, AND WARD COUNTIES §
TEXAS (SAND LAKE TO SOLSTICE §
AND BAKERSFIELD TO SOLSTICE) § ADMINISTRATIVE HEARINGS

**INITIAL POST-HEARING BRIEF OF FORRISTER GENERATION-SKIPPING
TRUST AND ALAN ZEMAN**

TO THE HONORABLE ADMINISTRATIVE LAW JUDGES:

On February 21, 2019, the Administrative Law Judges (“ALJs”) conducted a Hearing on the Merits and admitted the pre-filed Direct Testimony of Forrister Generation-Skipping Trust as “Forrister Exhibit 1” and Alan Zeman as “Zeman Exhibit 1.”

At the hearing on the merits, Routes 320, 324, 325 and 41 (some with modifications) were the focus of all the proposed alternative routes. Route 320 best addresses the routing factors set forth in PURA § 37.056(c)(4), P.U.C. SUBST. R. 25.101(b)(3)(B), and the Preliminary Order. Route 320 is supported by the Applicants and the undersigned Intervenor and best meets the overall community values. In addition to Route 320, Route 324 supported by TPWD, Route 41 supported by Commission Staff and Route 325 (or a modified Route 324 or modified Route 325) are also acceptable routes and sufficiently comply with PURA § 37.056(c)(4), P.U.C. SUBST. R. 25.101(b)(3)(B), and the Preliminary Order and the overall community values. Consequently, there are no

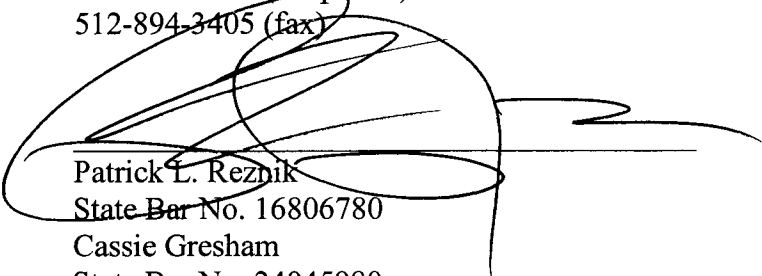
alternative routes or facilities configurations that would have a less negative impact on landowners.

Forrister Generation-Skipping Trust and Alan Zeman respectfully requests that the ALJs' Proposal for Decision ("PFD") recommend, and ultimately PUC Final Order approve, Route 320 or in the alternative Routes 41, 324 or 325 or acceptable modifications of those routes.

Respectfully submitted,

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**ATTORNEYS FOR FORRISTER
GENERATION-SKIPPING TRUST AND
ALAN ZEMAN**

CERTIFICATE OF SERVICE

I certify that a copy of this document will be served on all parties of record on March 5, 2019, in accordance with Public Utility Commission Procedural Rule 22.74.



Patrick L. Reznik